

CHEMICAL DIVISION



CHRYSLER
CORPORATION

January 16, 1985

RECEIVED

JAN 18 1985

HAZARDOUS WASTE DIV

Kenneth L. Damrel
Department of Natural Resources
Hazardous Waste Division
S. E. Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

Ref: Your letter dated December 26, 1984 - MID 005358049



Dear Mr. Damrel:

We have reviewed the five violations and one suggestion that resulted from your December 18, 1984 inspection and have taken the following action:

Violation #1. Seven drums in your drum storage area were stored for more than 90 days. You are limited to a maximum accumulation time of 90 days as required by 40 CFR 262.34(a).

Action: The hazardous waste collection, identification, labeling storage, shipping and monitoring procedure was reviewed and modified to assure that proper handling of waste will occur. Sufficient time has been built into the system, with checks, to assure the timely (90 days) disposal of stored drums. The seven drums noted during the inspection were removed (please refer to Exhibit A).

Violation #2. Personnel training documentation does not include the name of each employee filling each position at the facility related to hazardous waste management, a written job description for each of these positions, nor a description of the required training that will be given to each person filling these positions, as required by 40 CFR 265.16(d)1,2, and 3.

Action: Although the required training was provided, we will expand our record keeping requirements to completely satisfy 40 CFR 265.16 (d)1,2, and 3.

Violation #3 Your records of training do not specify what training was given to the persons listed on these records as required by 40 CFR 265.16(d)4.

Action: Although the required training was provided, we will document the nature of training provided as required under 40 CFR 265.16(d)4.



Violation #4. It could not be determined by review of your training documentation whether or not new personnel have received the required training within six months, as required by 40 CFR 265.16(b).

Action: The training of new personnel has been provided and future records will reflect the requirements outlined in 40 CFR 265.16(b).

Violation #5. You are required to test and maintain facility alarm systems, fire protection equipment, and spill and decontamination equipment as required by 40 CFR 265.33. Although you stated that this is done, you are requested to provide to this office documentation of this testing and maintenance.

Action: Although no formal log has been maintained, I have been assured by the Manufacturing Engineering Manager that the appropriate test has been conducted and a log of such test will be maintained. In addition, we are in the process of employing Hubbell, Roth and Clark a professional engineering consultant to prepare for us an episode plan that includes all emergency procedures, SPCC requirements, CERCLA requirements and PIPP requirements.

Suggestion #6. Though not citing these as a deficiency of RCRA, it was suggested at time of our inspection that enough aisle space be maintained inside the drum storage area to allow easier access. Also, your contingency plans appears outdated and should be revised.

Action: Henceforth, aisle space will be provided for easy access and visual inspections of drums and labeling at the dyked drum storage area.

Our current contingency plan will be updated to reflect current names and positions. As stated in #5 our current contingency plan will be incorporated into the episode plan.

If there are any questions, please feel free to contact me at 671-4741.

Sincerely,


Larry A. Roman
Plant Manager

/ph
Attachs.